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COUNSEL FOR THE DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA AND SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	JOINTLY ADMINISTERED

**AGENDA OF MATTERS SCHEDULED FOR HEARING ON
MARCH 9, 2021 AT 1:30 P.M. (CT)**

UNCONTESTED MATTERS GOING FORWARD:

1. Debtors' Emergency Motion for Authority to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Forms [Docket No. 5]

Response/Related Documents: Declaration of Robert G. Owens in Support of Certain First Day Motions [Docket No. 11]; Declaration of Sonya B. Rowling in Support of Certain First Day Motions [Docket No. 12]; Interim Order Authorizing the Debtors to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Bank Accounts [Docket No. 52]; and Second Interim Order Authorizing the Debtors to Continue Use of Existing Cash Management System, Maintain Existing Bank Accounts,

¹ The last four digits of Debtors' taxpayer identification number are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

Pay Certain Costs and Fees Associated with Credit Card Transactions, and Continue Use of Existing Bank Accounts [Docket No. 168].

Comments: There has been no opposition to this motion, and the Debtors tentatively believe that they are in agreement with the Committee on the form of a final order on this motion. Subject to confirmation of the agreement between the Debtors and Committee on the final form of order, the Debtors will notify the Court and submit the form of agreed order prior to the hearing.

Status: This matter is going forward.

MATTERS NOT GOING FORWARD:

2. Debtors' Motion for Waiver of the Requirements of Section 345(b) [Docket No. 78].

Response/Related Documents: None.

Comments: The Debtors are near a final resolution of the issues raised in this motion but require additional information from the Office of the United States Trustee related to the form and content of the bond required under Section 345(b). The Debtors have requested the information from the United States Trustee but have not yet received a response. Once the United States provides the requested information, the Debtors believe they will be in a position to either withdraw this motion or submit an agreed order resolving the motion. In the event the United States Trustee is unable or unwilling to provide the information requested, the Debtors will seek further guidance from the Court. The Debtors believe that a further continuance of the hearing on this motion will provide them with sufficient time to address these final issues with the United States Trustee and proposed bonding company.

Status: The Debtors request that the hearing on this motion be reset to the next omnibus hearing on March 17, 2021.

Dated: March 8, 2021

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.

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COUNSEL FOR THE DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 8th day of March 2021 a true and correct copy of the foregoing was served electronically via this Court CM/ECF notification system.

/s/ John D. Gaither
John D. Gaither